

Equal Employment Opportunity Plan



Southwest Georgia
Regional Commission

Southwest Georgia
Regional Commission
May 2013

TABLE OF CONTENTS

Preface.....	3
I. Administration of the Equal Opportunity Plan	4
A. Equal Opportunity Officer.....	4
II. Responsibilities of Administration Staff	5
III. Departmental Equal Opportunity Officer.....	5
IV. Responsibility for Establishing Procedures for Employment.....	5
V. Reporting & Monitoring	5-7
VI. Dissemination of the Equal Opportunity Policy & Plan	7-12
A. Equal Employment Opportunity Policy & Plan	7-12
i. Recruitment	7
a. Applicants & Applications	7-8
b. Pre-Employment Testing.....	8-9
ii. Selection	9
iii. Job Structuring	10
iv. Training	10
v. Management Training.....	11
vi. Upward Mobility.....	11
vii. Performance Appraisal	11
viii. Staff Grievance Procedures	11
ix. Internal Monitoring, Evaluation and Auditing System	12
VII. Harassment Prevention Policy.....	12
VIII. Non-Discrimination Policy	12

PREFACE

The Southwest Georgia Regional Commission (RC) reaffirms the policy of this agency with respect to equal opportunity. Employment at the Regional Commission is administered without regard to race, color, national origin, religion, creed, sex, age, sexual orientation, veteran status, political affiliation or disability status. The RC's non-discrimination policy extends to recruitment, selection, hiring, compensation, promotion, training, and all other aspects of employment.

The RC's policy is in compliance with Title VII of the Civil Rights Act of 1964, as amended, Executive Order 11246, as amended, the Rehabilitation Act of 1973, as amended, the Civil Rights Restoration Act of 1988, as amended, The Americans with Disabilities Act of 1990, as amended and all other applicable Federal and State laws.

The Regional Commission bases employment decisions on the principle of equal opportunity, and ensures that all employment related decisions are in accord with the principles of equal opportunity. The Regional Commission further ensures that all personnel actions such as compensation, benefits, transfers, layoffs, terminations, training and education are administered without regard to race, color, religion, creed, national origin, sex, age, disability, veteran status, or political affiliation/influence.

The development of the RC's Equal Opportunity Plan and implementation of the equal opportunity program are primarily the responsibilities of all Regional Commission administrators, especially supervisors and managers who are authorized to make employment related decisions.

I. ADMINISTRATION OF THE EQUAL OPPORTUNITY PLAN

A. EQUAL OPPORTUNITY OFFICER

The Equal Opportunity Officer for the Regional Commission reports to the Executive Director. The duties of the Equal Opportunity Officer include the following:

1. To monitor continuously the administration of the **Equal Opportunity Plan**;
2. To help devise systems for the implementation of the **Equal Opportunity Plan** and the achievement of its goals, including forms and procedures for the continuous reporting and monitoring of appointment, promotion, and salary actions;
3. To advise and assist the Executive Director and Administrative staff with equal opportunity matters;
4. To receive complaints and concerns from individuals and groups with respect to personnel actions alleged of discrimination in regard to race, color, religion, creed, national origin, sex, age, disability, or veteran status and to advise and assist such complainants in the handling of such complaints;
5. To identify problems with respect to the implementation of the **Equal Opportunity Plan**;
6. To keep the Executive Director informed of the progress and problems in the administration of the **Equal Opportunity Plan**;
7. To evaluate the effectiveness of the **Equal Opportunity Plan**;
8. To serve as The RC's liaison with local, state and federal agencies in equal opportunity employment matters;
9. To be a point of contact with organizations representing women and minorities;
10. To meet with and keep Administrative staff informed of developments in the entire equal opportunity area;
11. To advise the Executive Director concerning any needed revision of the RC's **Equal Opportunity Plan**.

II. RESPONSIBILITIES OF ADMINISTRATIVE STAFF

The Equal Opportunity Officer plays an essential role in the achievement of equal employment opportunity in the Regional Commission, but the achievement of the goals of the equal employment opportunity plan will depend on the administrative staff with day-to-day responsibility for making employment decisions in the agency.

Directors are responsible and accountable together with the Regional Commission for meeting the goals which are designed to eliminate the under-utilization of minority, female and disabled employees and the barriers to equal opportunity that cause this under- utilization, and for compliance with Regional Commission and State employment policies and procedures.

III. DEPARTMENTAL EQUAL OPPORTUNITY OFFICER

Another factor in implementing the **Equal Opportunity Plan** is the designation of an Equal Opportunity Officer, who is responsible for seeing that the requirements of the Regional Commission are carried out. The Equal Opportunity Officer is a person designated by the Executive Director who is familiar with the RC's **Equal Opportunity Plan**, committed to its goals, and willing and able to devote sufficient time to the responsibilities of the position. The most crucial responsibility of the Equal Opportunity Officer is to scrutinize the search process at those points at which candidates are excluded from further consideration and examine the criteria upon which those exclusions are based. This person also makes possible two-way communication to ensure compliance with the **Equal Opportunity Plan**.

IV. RESPONSIBILITY FOR ESTABLISHING PROCEDURES FOR EMPLOYMENT

The responsibility for designing procedures and for devising the methods of review is that of the Equal Opportunity Officer and managerial staff.

The monitoring process covers recruiting methods, initial appointments, promotions, reclassifications, transfers, demotions, reappointments and salary-setting actions. These decisions and actions are amply documented to permit the required monitoring.

V. REPORTING AND MONITORING

Compliance with this **Equal Opportunity Plan** requires the use of formal procedures in evaluating candidates for initial appointment, promotion, reclassification, transfer, demotion, re-appointment and salary-setting actions. Regional Commission procedures require that careful records of selection and non-selection decisions made be kept.

These procedures have been designed to help insure that in decision making at all levels that no improper consideration of race, color, religion, creed, national origin, sex, age, disability, sexual orientation, veteran status or political affiliation/influence intrudes, and that in appearance as well as in fact, fairness prevails.

Full records of decisions and the grounds for them are necessary, and are kept so that the reviewing officers (including the Equal Opportunity Officer) remain currently informed of

efforts made to recruit and hire minority and women candidates. They are kept also to enable the Regional Commission to respond to any future inquiry that might be made with respect to any appointment, promotion, reclassification, transfer, demotion re-appointment, and salary-setting decision made by a department.

The matter of procedures employed and records kept in the course of employment activities are subject to continuing review and evaluation by the senior administrative officers of the Regional Commission and by the Equal Opportunity Officer.

Some of the methods used by Human Resources staff to ensure that employment decisions are made in accordance with the **Plan** include:

- Maintenance of centralized application and referral procedures;
- Inclusion of minority and female members on the Human Resources staff;
- Continuing education and training of its staff and departments on relevant laws, policies, systems, data and equal employment opportunity objectives;
- Extensive recruitment from all reasonably available sources to maximize the numbers of minority and female applicants from those available in the RC's recruitment area;
- Continuing recruitment from local vocational rehabilitation offices and other sources for referral of disabled persons interested and available in the RC's recruitment area;
- Review and follow-up of hiring decisions with operating departments as to correct application of personnel policy and compliance with equal employment opportunity goals;
- Continuing to publicize the Dispute Resolution and Staff Grievance Procedure for reporting, without fear of reprisal, complaints of alleged discrimination;
- Prompt and responsive handling of any such complaint;
- Maintenance of applicant information and other relevant data to determine if race or sex is a factor in non-selection of applicants.

The Regional Commission will at appropriate intervals, re-examine the various aspects of its equal opportunity efforts. Should any instances of discrimination be discovered in such analyses, or by other available means, the Executive Director will take corrective action.

VI. DISSEMINATION OF THE EQUAL OPPORTUNITY POLICY AND PLAN

The RC's **Equal Opportunity Plan** has been disseminated both internally and externally. The policy has appeared and will continue to appear in several Regional Commission sponsored publications. These publications reach all levels of Regional Commission employees.

Additionally, the equal opportunity policy is included in the RC Personnel Policies and is reviewed with new employees during orientation.

A. Equal Employment Opportunity Programs

i. Recruitment

The Southwest Georgia Regional Commission actively recruits from a variety of sources to achieve a diverse workforce that successfully meets the needs and demands of the organization. The RC staff will:

- Assess the need for the position to ensure it contributes to meeting the goals, objectives, and mission of the agency;
- Conduct a job analysis including a review of the duties and responsibilities of the position, and the qualifications required for successful performance; and
- If necessary, revise the position description.

Job analysis is necessary only when there is a change in the duties and responsibilities that impacts the qualifications required. If a current, accurate job analysis already exists for a given job type, there is no need to conduct an analysis for each vacancy. For example, in instances where there is a high volume of positions in a class, frequent turnover in a class, or little job change, there will likely not be a need to conduct a new job analysis each time a vacancy occurs.

The Human Resources staff will work together to assure that the training and experience requirements necessary for successful performance of the duties of the position are identified.

The Human Resources staff will use information from the job classification, as well as any additional information provided by the hiring department, to write the vacancy announcement to meet the RC's requirements. In addition, Human Resources staff will consult with the hiring department to determine the need for additional recruitment sources including professional journals, newspapers, and technical colleges/universities to target specific audiences. Unless otherwise noted, the posting for job openings will be posted to designated websites, as well as on job posting board located within the office.

The departments are responsible for reviewing applications received based on overall qualifications. From this ranking, departments will choose applicants for interview, and select the most qualified candidate from those interviewed. While no requirement exists indicating the specific number of interviews a department must conduct, the Human Resources recommends interviewing at least three of the most qualified candidates for a vacancy.

a. Applicants and Applications

An important foundation for recruiting is the processing and maintenance of Applications for Staff Employment. A resume is required for each vacancy for which an applicant desires consideration. For the purpose of the Plan, an applicant is any person who submits a resume

(paper or electronic) form. The application will remain active until the position is filled or cancelled.

If no applicants clearly exceed the minimum qualifications, the hiring department may consider the existing applicants to be the most qualified applicant pool. Or, the Hiring Supervisor may choose to extend the closing date, should the initial recruitment efforts not generate sufficient applications.

All employment facilities are open to all applicants on the same basis, by policy and practice and, as requested, accommodations are made for any applicant voluntarily self-identified as having a disability.

Timely feedback is presented to each employee interviewed for a position after the selection decision is made and the job is filled.

Continuing recruitment activities for Staff personnel include the following:

- Participate in Career Day programs offered at community colleges and technical schools, or at
- Job/Career Fairs sponsored by other community organizations and area employers;
- Periodic contact with community organizations, including the Community Action Council, the Historically Black Colleges/Universities, and the NAACP local chapters;
- Periodic contacts with leading black citizens in the RC's recruitment area (Region 10)
- Advertisements, as appropriate, are placed in the recruiting area's black owned newspapers as well as extensive advertising in the widely circulated daily newspaper: The Albany Herald, Albany, GA.
- Regular contacts with representatives of vocational rehabilitation offices, veteran's groups, sheltered workshops and services for the blind offices, and attending the quarterly meetings of the Employer Committees.

b. Pre-employment Testing

The Regional Commission currently uses pre-employment tests on personal computers for determining typewriting and spelling proficiency as part of the selection process for certain secretarial/clerical Staff positions. The scores are used only to the extent that they are job-related and no centralized blanket cutoff scores exist. These instruments normally are used to test applicants for the positions to be filled.

The Human Resources staff will be available as needed as an advisor to ensure that policies and procedures are consistently applied. The department conducts essential reference checking, makes the employment decision and submits the necessary job-related documentation on each applicant considered for employment. The Human Resources staff determines the maximum qualifying salary available for the job offer and advises the hiring departments as to salary administration and other appropriate personnel policies. Following this, department supervisor extends the offer to the selected candidate, covering the salary offer, conditions of employment and proposed effective start date

The customary procedures for referral are followed day-to-day. However, as might be

expected in a dynamic work situation, minor variations are necessary to handle contacts with applicants and employees, the continuing contact between the HR staff and hiring departments, the scheduling of interviews by department representatives, the scheduling of pre-employment tests, and essential reference checking by the departments and related processes. These variations, when they occur, must not breach the spirit of equal employment opportunity.

At a given time, there might be no candidate or many candidates for a given opening, and increasingly greater needs for qualified applicants. Even so, it is not the RC's practice and it is not in the RC's interest to turn away any candidate qualified for an open position, except when a better-qualified candidate is selected.

The Human Resources staff are carefully selected and trained. No person with any identifiable bias is selected or retained for this staff. Each staff member receives continuing orientation and training to insure commitment to equal employment opportunity goals and objectives and to be aware of even inadvertent bias arising out of procedures or any other source

The Regional Commission will, at appropriate intervals, reexamine the various aspects of its equal employment opportunity efforts. Should any instances of discrimination based on race, color, religion, creed, national origin, sex, age, disability, sexual orientation, veteran status or other non-job related factors be discovered in such analyses, or by other available means, corrective action will be taken promptly by the Executive Director.

ii. Selection

Using methods and procedures consistent with the principles and goals of equal employment opportunity, the Human Resources Department is responsible for the recruitment, preliminary screening and referral of the applications of candidates for permanent staff positions. The head of the hiring department or Executive Director has the final selection authority. The recruitment and selection process will comply with all Federal and State laws, regulations and policies and will give equal employment opportunity to all applicants, without regard to race, religion, color, creed, national origin, sex, age, disability, or political affiliation/influence. The final selection decision will be made from among the most qualified applicants, which includes applicants with re-employment priority, based solely on job-related criteria. **Ultimately, the hiring department in its judgment selects the best-qualified candidate, consistent with Equal Opportunity requirements.**

After selecting a candidate for hire, the department will be responsible for documenting and justifying the job-related reasons for hiring recommendation. In addition, the department must also document the specific reasons for non-selection of all other applicants referred. The Human Resources Department will be available for guidance and assistance to the hiring department at any time during the selection process.

iii. Job Structuring

The Human Resources Department administers the Human Resources policy covering salary matters with respect to reclassification. Operating departments are responsible for the assignment of duties and responsibilities to positions at the outset and for changing these as operations require. The system requires that the department prepare and submit to the Office of Human Resources a description for each new position.

As requested, the HR Manager will provide advice and counsel to departments on position design and the formulation of position descriptions, among other things. Human Resources reviews the description for clarity and understanding and interviews department representatives and supervisors as appropriate for any clarification of responsibilities and additional information needed to assure a fair, correct and equitable decision. Following this and any other necessary study, the HR Department classifies the position by assigning it to the correct classification and salary grade, based on the duties and responsibilities assigned by the hiring department. The qualifications of any particular employee are not considered in classifying the position itself.

When a department significantly changes the duties and responsibilities of an existing filled position, it is responsible for submitting the description and for requesting that the position's classification be studied. The Human Resources Department evaluates the position, as described above, and in so doing may interview each employee involved before reclassifying the position. **Departments have the fundamental responsibility for maintaining accurate position descriptions with respect to actual and essential duties performed for each position.**

iv. Training

The Human Resources Department will provide recruitment and selection training to managers and supervisors through such courses as Management Levels I, II, III, IV and other programs. These programs, as well as others, address a wide variety of management, supervisory, and employee needs. The department's mission is to provide meaningful training opportunities which encourage development, stimulate productivity, create a healthier workplace environment and enhance the capabilities of the RC's committed and diverse work force. Special training will be available on request from hiring departments as needed.

All educational and other training programs sponsored by the Regional Commission are open to qualified employees without regard to race, color, religion, creed, national origin, sex, age, disability, sexual orientation, or veteran status. Employees are encouraged to avail themselves of these benefits in response to a planned, continuing variety of communications from the HR Department. Educational leaves may be granted by the Regional Commission for purposes that will tend to make its employees more valuable.

Information regarding Training and Development programs, tuition waiver, and educational assistance programs, is available in the Southwest Georgia Regional Commission Personnel Policy Manual.

v. Management Training

Critical to the RC's equal opportunity efforts and success are its training programs for managers and supervisors. Periodic special training is conducted by the Executive Director or his designee to explain to Regional Commission administrators the RC's Equal Opportunity Policy and to define individual responsibility for the effective implementation of equal employment opportunity.

Other training day-to-day occurs between managers and the Office of Human Resources. The

centralized training administered by HR is specific and comprehensive for managers/supervisors and is offered on a regular, recurring basis as follows:

- the definition of equal employment opportunity;
- the legal basis for equal opportunity
- interpreting and applying equal opportunity policies and guidelines;
- sexual and racial harassment policies, the established procedures for reporting investigating and resolving such matters;
- preventing work place harassment;
- the guidelines for valid and legal selection procedures;
- identifying and eliminating barriers which can lead to discrimination;
- implementing the equal employment opportunity program for Staff employment.

vi. Upward Mobility

The Regional Commission has formal systems designed to move Staff employees seeking upward mobility through transfer or promotion.

The number of promotion opportunities generally depends on fund availability absent any spending restrictions. Promotions include upward movement in the same position through position reclassification or salary range revision or by transfer to another position at a higher salary grade within the same department or by transferring to another department.

vii. Performance Appraisal

Information on the RC's Performance Management System can be found in the Southwest Georgia Regional Commission Personnel Policy Manual.

viii. Staff Grievance Procedure

Information on grievance procedures is available in the Southwest Georgia Regional Commission Personnel Policy Manual.

ix. Internal Monitoring, Evaluation and Auditing System

Considerable responsibility for monitoring, analyzing and evaluating the RC's equal opportunity progress rests with the Office of Human Resources. These responsibilities are carried out in numerous formal activities as follows:

- Semi-Annually monitoring as to hiring and placement results compared to the annual hiring and placement goals set by race and sex.
- Semi-Annually monitoring as to promotion activity selections by race, sex.
- Semi-annually monitoring of job offers declined, by classification title, race, sex
- Annually compiling, analyzing and reporting (to the RC Board) an extensive report covering all aspects of equal opportunity progress.
- Upon request, responding to reviews by any Federal Agency.

VII. HARASSMENT PREVENTION POLICY

In order to promote harmonious work relationships and maintain a professional atmosphere, the Southwest Georgia RC has a policy prohibiting all forms of harassment. All forms of harassment which create an offensive working environment are forbidden, including, but not limited to, insulting, intimidating or discourteous conduct, as well as derogatory jokes or comments relating to race, color, religion, sex, age, disability, national origin, sexual orientation, or other protected status under applicable equal employment opportunity laws.

Any employee who feels that he or she has been harassed in violation of this policy should contact the Human Resources Department. Except to the extent necessary to conduct the investigation and take appropriate corrective action, if warranted, all communication concerning complaints under this policy will be kept confidential; in all instances any disclosure will be limited to those persons with a need to know. Information on the sexual harassment policy is found in the Southwest Georgia Regional Commission Personnel Policy Manual.

VIII. NON-DISCRIMINATION POLICY

The Southwest Georgia Regional Commission is an Equal Opportunity Employer. The RC reaffirms its commitment to equality of opportunity and pledges that it will not practice or permit discrimination in employment on the basis of age, gender, race, color, national origin, religion, creed, disability, veteran's status or sexual orientation. This non-discrimination policy is also included on all educational or employment material distributed or published.